

EXHIBIT 2

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**[PROPOSED] ORDER ON PLAINTIFF’S MOTION
TO COMPEL DEPOSITION AND DOCUMENT DISCOVERY**

The Court, having considered Plaintiff’s Motion to Compel Deposition and Document Discovery, Defendant’s Opposition, and Plaintiff’s Reply, the Court hereby grants Plaintiff’s Motion and hereby:

1. Orders Google to designate one or more witnesses to testify about the topics identified on the Rule 30(b)(6) Notice attached as Exhibit 1 to Plaintiff’s Motion to Compel;
2. Authorizes Singular to reopen the depositions of [REDACTED];
3. Authorizes Singular to reopen the deposition of [REDACTED];
4. Orders that, prior to the above-referenced depositions and the deposition of Dr. Jeff Dean, which the Court previously authorized, and no later than seven days after the entry of this Order, Google shall produce to Singular the following documents:

- a. All responsive, non-privileged documents Google or its counsel have reviewed or of which they are otherwise aware, regardless of whether they hit on search terms applied by Google or were sourced from one of the eleven Google custodians Singular identified pursuant to the ESI Order, ECF No. 68; and
- b. All non-privileged documents within the 7,817 document families that hit on the search term “Bates.” Google may not withhold any of the 7,817 documents on any non-privilege ground, including but not limited to, responsiveness or relevancy.

BY THE COURT:

Date: _____

F. DENNIS SAYLOR IV
United States District Judge